

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

<p>CATHERINE MAZZOLA, M.D., NEW JERSEY PEDIATRIC NEUROSURGICAL ASSOCIATES, LLC, and NEW JERSEY PEDIATRIC NEUROSURGICAL INSTITUTE, LLC</p> <p>Plaintiffs,</p> <p>v.</p> <p>AMERIGROUP NEW JERSEY, INC. d/b/a AMERIGROUP COMMUNITY CARE, ABC COMPANIES 1-10, AND JOHN DOES 1-100,</p> <p>Defendants.</p>	<p>Civil Action No. 2:17-cv-05332 (SDW-LDW)</p> <p>NOTICE OF CROSS-MOTION TO AMEND COMPLAINT AND REMAND TO <u>NEW JERSEY SUPERIOR COURT</u></p> <p><i>Filed Via ECF</i></p>
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PLEASE TAKE NOTICE that, upon the annexed Declaration of Jeremy Klausner and the exhibits thereto and the accompanying Memorandum of Law, Plaintiffs Catherine Mazzola, M.D., New Jersey Pediatric Neurosurgical Associates, LLC, and New Jersey Pediatric Neurosurgical Institute, LLC will cross-move this Court, on November 20, 2017, at 9:00 a.m. or as soon thereafter as counsel may be heard, before the Honorable Susan D. Wigenton, at the United States Courthouse (MLK), Courtroom 5C, 50 Walnut Street, Newark, NJ 07101, for an Order granting Plaintiffs leave to file an amended complaint and remanding this case to New Jersey Superior Court for lack of subject matter jurisdiction.

PLEASE TAKE FURTHER NOTICE that, answering papers, if any, are due to be served and filed by November 13, 2017.

Dated: Hackensack, NJ
November 6, 2017

Respectfully Submitted,

s/Jeremy Klausner
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